TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

40 EXCHANGE PLACE 18th FLOOR NEW YORK, NEW YORK 10005

PHONE: (212) 482-0007 FAX: (212) 482-1303 www.talkinlaw.com email:info@talkinlaw.com

Maryland Office: 5100 Dorsey Hall Drive Suite 100 Ellicott City, MD 21042 (410) 964-0300 New Jersey Office: 2500 Plaza 5 Harborside Financial Center Jersey City, NJ 07311 (201) 342-6665

May 11, 2020

Application granted. Sentencing adjourned to July 23, 2020 at 12:00 p.m.

SO ORDERED:

Honorable William H. Pauley III United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

U.S.D.J.

May 11, 2020

Re:

<u>United States v. Hector Valdez Turbi</u>

19 Cr. 403 (WHP)

Dear Judge Pauley:

VIA ECF

cc:

Defendant Hector Valdez Turbi ("Turbi") is currently scheduled for a sentencing hearing before the Court on May 21, 2020. Due to the COVID 19 epidemic, I still have been unable to meet with Turbi with the assistance of an interpreter to discuss sentencing issues or to gather all the necessary supporting documents. For this reason, Turbi respectfully requests an approximately sixty day adjournment of his sentencing to a date convenient to the Court and government. Recently, a system for video-conferencing was established and I will endeavor to set up video meeting with an interpreter as soon as possible. The government, by Assistant United States Attorney Michael Longyear, consents to this application.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin

AUSA Michael Longyear (by ECF)